

2021CF000260

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And furthermore, invoking the provisions of Wisconsin Statute Section 939.617, upon conviction the Court shall impose a bifurcated sentence including a term of initial confinement for at least three years.

Count 3: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant Between December 15, 2020 through March 16, 2021, Rock County, Wisconsin, did, having attained the age of 18, knowingly possess photograph(s) of a child engaging in sexually explicit conduct, and knew that the child was under the age of 18, contrary to sec. 948.12(1m)&(3)(a), 939.50(3)(d) Wis. Stats., a ***Class D Felony***, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

And furthermore, invoking the provisions of Wisconsin Statute 973.042(2), upon conviction for a crime under 948.05 or 948.12 and the defendant is at least 18 years of age at the time of the commission of the crime, the Court shall impose a surcharge of \$500.00 for each image or each copy of an image, as defined in 973.042(1), associated with the crime. The court shall determine the number of images or copies of images associated with the crime by a preponderance of the evidence and without a jury.

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Count 7: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant Between December 15, 2020 through March 16, 2021, Rock County, Wisconsin, did, having attained the age of 18, knowingly possess video of a child engaging in sexually explicit conduct, and knew that the child was under the age of 18, contrary to sec. 948.12(1m)&(3)(a), 939.50(3)(d) Wis. Stats., a **Class D Felony**, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

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Count 9: POSSESSION OF CHILD PORNOGRAPHY

The above-named defendant Between December 15, 2020 through March 16, 2021, Rock County, Wisconsin, did, having attained the age of 18, knowingly possess video of a child engaging in sexually explicit conduct, and knew that the child was under the age of 18, contrary to sec. 948.12(1m)&(3)(a), 939.50(3)(d) Wis. Stats., a **Class D Felony**, and upon conviction may be fined not more than One Hundred Thousand Dollars (\$100,000), or imprisoned not more than twenty five (25) years, or both.

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PROBABLE CAUSE:

Detective DuCharme of the Rock County Sheriff's Department reports that on February 4, 2021 he received a cyber tip from the National Center for Missing and Exploited Children (NCMEC) through the Wisconsin Department of Justice-DCI. The tip came from the social media application Facebook in regards to 13 images and videos of suspected child exploitation material was uploaded to Facebook using an identifiable IP address. An administrative subpoena on that particular IP address used to upload the possible child pornography was traced back to 1852 West Emerald Terrace, Town of Fulton, County of Rock, State of Wisconsin. Further information from Facebook indicated that the Facebook account was named under a "Brandon Schuma." It did provide a mobile phone number and email address for Brandon Schuma. Charter Communications provided the information for the subscriber of the particular IP address in question as Noah Eisele with his address at 1852 West Emerald along with a phone number which matched the phone number under the Facebook account for Brandon Schuma.

Detective DuCharme was able to view the evidence provided by NCMEC and he was able to ascertain that the following pieces of evidence were child pornography:

Image One: A photo that depicts a naked pubescent male and a naked pubescent female lying in a bed. The male is depicted on the left side of the photo in an unnatural position. The male's right side and knees are propped up on the bed causing his butt to be up in the air. The male's naked anus and testicles are in the direction of the camera. There is no visible pubic hair but there is some indication that this particular male is in the beginning stages of puberty. The naked female is depicted on the right side of the photo and the female has something tied on her left wrist. The female is lying on her right side and is propped up by her elbow. The female's legs are crossed at the knees and is towards the lower left of the image. The female's breasts are exposed and there appears to be some minimal breast development. The focal point of this image are the genitalia of both individuals and the image is

designed to illicit a sexual response. Any reasonable person would know that the male and female depicted in the image are well under the age of 18 years old.

Image Two: This image features a pubescent female and a prepubescent male lying together on a bed. There is notable size difference between the female and the male. The female is on the left side of the photo fully nude lying on her stomach with her bare vagina and anus visible in the image. The fully nude prepubescent male is on the right side of the image and is lying on his back. His hands are on his sides and his right leg is slightly bent touching the buttocks of the female in an unnatural pose. His naked penis testicles are visible in the photo. The prepubescent male displays no muscle development, no pubic hair, and it appears no reproductive changes have occurred due to puberty. The focal point of the image is the female's genitalia along with the prepubescent male's genitalia. The image is designed to elicit a sexual response, and a reasonable person would know that the male depicted in the image is well under the age of eighteen years old.

Image Three: This images depicts a naked prepubescent male and a naked pubescent female photographed in a sexual position. The male is holding a silver gun with a black handle in his left hand with the barrel resting on the back of the female. The male is standing behind the female who is on all fours. The prepubescent male's penis is pressed up against the female's vaginal area and his right hand is on the female's right buttock, simulating a sex act. There is a significant size difference between the male and the female. The focus point of the image is a prepubescent male performing a sex act on a pubescent female. The image is designed to elicit a sexual response, and a reasonable person would know the prepubescent male depicted in the image is well under the age of eighteen years old.

Image Four: This image depicts what appears to be a younger subject, performing oral sex on a prepubescent male. The prepubescent male's penis is inside the younger subject's mouth. There is no pubic hair on the prepubescent male, and there appears to be no changes caused by puberty. The focal point of the image is the unknown younger subject performing oral sex on the prepubescent male. The image is designed to elicit a sexual response, and a reasonable person would know the male depicted in the image is well under the age of eighteen years old.

Video one: This video is a thirty four second video of a prepubescent male having sexual intercourse with an adult female. The prepubescent male is kneeling in between the legs of the female with her vagina exposed. The female's right hand can be seen grabbing the prepubescent male's erect penis, and directing it inside of her vagina. During the video, it is shown the prepubescent male having sexual intercourse with the female. The focal point of the video is the prepubescent male having sexual intercourse with the female. The video is designed to elicit a sexual response, and a reasonable person would know the male depicted in the image is well under the age of eighteen years old.

Image five: Is an exact copy of image number four described above.

Image six: Is an exact copy of image number four which is described above.

Video two is an exact copy of video number one described above.

Video number three is an exact copy of video number one described above.

On February 9, 2021, Detective DuCharme reports that he drafted a search warrant for the content of the Facebook account created under the name "Brandon Schuma" from February 1, 2020 to February 9, 2021. The warrant was signed by a Rock County Judge. On March 1, 2021, at approximately 7:30AM, Facebook sent an e-mail to Detective DuCharme with contents from the Facebook account associated with Noah Eisele, utilizing user account name Brandon Schuma, with the associated phone number which is the same as Eisele's phone number. The content received contained 13,250 images

and videos. Numerous images and videos are believed to be suspected child pornography, including the images mentioned in the NCMEC CyberTip that were described above.

Detective DuCharme reports on March 1, 2021, after reviewing all of the information received so far, he began reviewing the image and video content received from Eisele's Facebook account. The account contained a large amount of photos and videos of age-difficult females performing sex acts on themselves, and taking photos of their breasts and vagina in unnatural poses. Detective DuCharme then reviewed messaging content from the account. The Facebook account showed over 300,000 messages. While reviewing the content, Detective DuCharme discovered that the profile picture used for the account of "Brandon Schuma" is a younger male that is a famous picture that is associated with an "Alex from Target" picture that became a media sensation in 2014. It appears as if Eisele downloaded picture of this "Alex from Target" and used them during communications with underage females to believe he was sixteen years old. Many of the conversations were from Eisele to young females between the ages of twelve and seventeen years old. The younger females were from numerous states, including, but not limited to: Wisconsin, Illinois, Michigan, New York, and Ohio. Many of the conversations with the females would start with the same flirtatious paragraph. Depending upon the response Eisele got from the juvenile female he would then move the paragraph forward and progress the talk into sexually more advanced discussions. If the female was reciprocating in these discussions Eisele would then request the juvenile females to take photos of their breasts and vaginas and also ask them to record themselves masturbating or sticking their fingers down their throats. In addition to requesting images and videos from the juvenile females, Eisele would send audio messages of him talking to the juvenile females sending them images of his erect penis and videos of him masturbating until he ejaculates.

Eisele also has numerous messages with other male Facebook users who he trades images and videos of underage girls with.

On March 1, 2021, Detective Bilhorn reports that she went through numerous conversations that Eisele had with individuals on Facebook that are underage in nature and he is posing as Brandon Schuma. In one such exchange of chats and pictures and images, he is chatting with an individual as O.M. who advises that she is thirteen years old. O.M. sends numerous pictures of herself to Eisele. The pictures of O.M. are sexual in nature and it is clear that the female is under the age of eighteen years old. Eisele sends pictures and videos of himself naked. Eisele also requests a video from O.M. sticking her fingers down her throat to gag herself as if she is simulating fellacio and she does send such a video to Eisele. It should be noted that Detective Bilhorn goes through nine other such messaging threads from girls who are identified between the ages of thirteen and seventeen and are similar to the exchange he has with O.M. Additionally, Detective Bilhorn goes through a message thread that Eisele has with an individual known as "Justin James" on Facebook. Eisele and James exchange images of known child pornography. Eisele provides James with a Dropbox link containing a video of a child masturbating with Eisele identifies a minor in the exchange. Eisele teaches James about the use of Dropbox and Mega for storing child pornography.

It should be noted on March 16, 2021, at approximately 8:00AM, Deputy Cliffe of the Rock County Sheriff's Department arrests Noah Eisele after he drops his children off to school.

Detective DuCharme reports on March 16, 2021, a search warrant was signed by Judge Kuglitsch at 11:59AM, and was executed on March 16, 2021.

Deputy Cowan reports that on March 16, 2021, he was one of the members of the Rock County Sheriff's Department that served the search warrant on Noah Eisele's wife J.E. at 1852 West Emerald Terrace. During the search of the residence numerous items were seized including hard drives, SD cards, Xbox console, PS4 console, laptop, iPod, and two amazon tablets. It should be noted that most of the things were reviewed and nothing of evidentiary value was located on them. Also during the

search warrant, it should be noted that J.E. asked the Rock County Sheriff's Department to take all the firearms in the house of which there were five total from the home and place them in safekeeping.

Detective DuCharme reports on March 16, 2021, at approximately 9:20AM, Detectives DuCharme and Knutson interviewed Eisele in the interview room at the Rock County Sheriff's Department Detective Bureau. Prior to being interviewed Eisele was read his Miranda Rights verbatim and when asked if he would give a statement Eisele said "I will listen to what you guys got to say, if you want". Eisele did sign the form. During the interview Eisele admitted that he was the individual who was associated with the Facebook named "Brandon Schuma". During the interview the Detectives asked Eisele if after confronting him with the thirteen images of child pornography associated with that account if it would make sense to you and Eisele stated "yeah, right, yeah, whatever, it is what it is... you reap what you sew".

During the interview, Eisele went on to say that he didn't having excuse for his behavior and this is something that tears him apart every day. Eisele described himself as a Christian, who struggled. Eisele furthermore indicated his wife was aware he struggles with pornography but did not know that he viewed child pornography. Eisele indicated he started viewing adult pornography at eleven years old and became desensitized and kept crossing boundaries in regards to his pornography viewing. When Eisele was asked when viewed child pornography he indicated that while looking at legitimate or public pornography sites there is a lot of sketchy stuff on there that goes back and forth between child and adult pornography.

Detectives asked Eisele about contacting minors online and Eisele indicated that it started with the idea of "does this really work", in regards to getting nude photos from minors. During the interview Eisele admitted to creating the fake Brandon Schuma account to try to talk to young girls to try to get them to send him stuff. Eisele indicated that he contacted an estimated amount of maybe one hundred females and that approximately fifty percent of the females would send nude photos/videos to him. Eisele said he wanted that content for his own sexual gratification and to masturbate. Eisele indicated that he needed help and some form of therapy and counseling. He further admitted that he has a pornography addiction.

Based on the foregoing, the complainant believes this complaint to be true and correct.

MCB/jc

Subscribed and sworn to before me on 03/19/21

Electronically Signed By:

Electronically Signed By:

Viengkhone Nouansacksy

Mason C. Braunschweig

Complainant

Assistant District Attorney

State Bar #: 1052395